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## MEMO ENDORSED

August 20, 2024

**Via ECF!**

Hon. Edgardo Ramos  
 United States District Judge  
 Southern District of New York  
 Thurgood Marshall U.S. Courthouse  
 40 Foley Square  
 New York, NY 10007

The application is  granted  
 denied



Edgardo Ramos, U.S.D.J  
 Dated: August, 21, 2024  
 New York, New York

Re: *Daryl Overy v. Jose Cestona, Turnaround and R. Roman Truck Leasing, Inc.*  
Civil Action No.: 22-cv-09382 (ER)

Dear Judge Ramos:

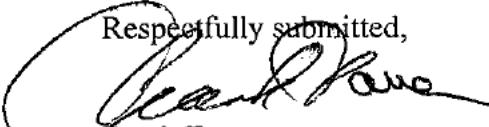
This firm represents plaintiff Daryl Overy in the above-referenced action. As ordered by this Court, Duffy & Duffy's motion to withdraw as counsel for the plaintiff, must be filed by August 23, 2024, therefore we respectfully submit this letter-motion requesting the Court's permission to file the declaration of Frank Torres, Esq., under seal, and to redact the confidential information from the publicly filed copy of said declaration. The un-redacted and redacted copies of declaration are being filed simultaneously with this request.

The reason we are seeking to file this declaration under seal is because the declaration supports a motion to withdraw as counsel, and such a filing is the preferred practice to preserve the confidentiality of the attorney-client relationship. *See, Team Obsolete Ltd. v. A.H.R.M.A. Ltd.*, 464 F. Supp. 2d 164, 165 (E.D.N.Y. 2006).

As ordered by this Court and with the Court's permission, on or before August 23, 2024, this firm will file the un-redacted declaration under seal on ECF and serve it together with the Notice of Motion to withdraw on the plaintiff, Daryl Overy, and will serve the redacted copy of the declaration together with the Notice of Motion to withdraw on opposing counsel.

Thank you for your consideration of this request

Respectfully submitted,



Frank Torres

/vr

cc: LEWIS JOHS AVALLONE AVILES, LLP. - **Via ECF**